

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL GRIFFIN,
 JAMES WILLIAMS,
 also known as "Rico,"
 and GEORGE COTTON,
 also known as "Shawn Cotton"

FILED

CASE NUMBER:

DEC 17 2013
 DEC 17 2013
 THOMAS G. BRUTON
 CLERK, U.S. DISTRICT COURT

UNDER SEAL

13CR 960

MAGISTRATE JUDGE KEYS

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about September 4, 2013, at Elgin, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

18 U.S.C. §§ 473 and 2

Offense Description

Sold, exchanged, transferred, and delivered false, forged, and counterfeited obligations of the United States, with the intent that the same be passed, published, and used as true and genuine.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.


 NICHOLAS A. SHELTON
 Special Agent, United States Secret Service

Sworn to before me and signed in my presence.

Date: December 17, 2013



Judge's signature

City and state: Chicago, Illinois

ARLANDER KEYS, U.S. Magistrate Judge

Printed name and Title

Federal Reserve Notes ("FRNs"), with the intent that the same be passed, published, and used as true and genuine, in violation of 18 U.S.C. §§ 473 and 2.

Background Provided by Confidential Source

4. In or around August 2013, a cooperating source ("CS") provided information to USSS agents regarding individuals who were selling counterfeit FRNs.¹ Specifically, CS advised that, earlier that month, he/she had met with three individuals, later identified as GEORGE COTTON (known to CS as Shawn Cotton), JAMES WILLIAMS (known to CS as "Rico"), and MICHAEL GRIFFIN, to purchase counterfeit FRNs. CS stated that, on two occasions, he/she placed a telephone call to COTTON to request counterfeit currency and then met with COTTON, WILLIAMS, and GRIFFIN in Elgin to purchase counterfeit currency.

5. CS stated that he/she first purchased counterfeit currency through COTTON during August 2013. On that occasion, CS met with COTTON, WILLIAMS, GRIFFIN and another individual in the detached garage of a home in Elgin. At that meeting, CS provided WILLIAMS with

¹ CS was approached by USSS agents after he/she purchased merchandise from a department store using counterfeit currency. Agents advised CS that they could not make any promises but that any cooperation provided would be considered in determining any potential charging and sentencing recommendations. Criminal history records for CS reflect that he/she was previously arrested for forgery.

approximately \$1,200 in genuine currency and received \$4,000 in counterfeit currency from GRIFFIN.

6. CS stated that, approximately two days later, he/she met with COTTON, WILLIAMS, and GRIFFIN in the same garage where they previously met. CS again provided WILLIAMS approximately \$1,200 in genuine currency and received \$4,000 in counterfeit from GRIFFIN.

7. On or about September 3, 2013, during an interview with USSS agents, CS identified a photograph of a home in Elgin as the location where he/she purchased counterfeit currency. CS also viewed a photo flip that included driver's license photographs of GEORGE DARSHAWN COTTON, JAMES WILLIAMS, and MICHAEL GRIFFIN. CS positively identified the individuals in those photographs as the individuals from whom he/she previously purchased counterfeit currency. CS stated COTTON is the person CS refers to as "Shawn" and that WILLIAMS is the person he/she calls "Rico." CS stated that GRIFFIN claimed to be the manufacturer of the counterfeit currency and stated that he was on parole for manufacturing counterfeit currency. A criminal records check confirmed that GRIFFIN was on parole for forgery at the time.

September 4 Currency Purchase

8. On or about September 3, 2013, at the direction of law enforcement, CS placed several telephone calls to COTTON. These calls went

11. Following the transaction, CS met with USSS agents. Agents retrieved the recording equipment, and CS provided USSS agents the suspected counterfeit which totaled approximately \$6,100, including 60 counterfeit \$50 FRNs bearing serial number CG19271586A and 62 counterfeit \$50 FRNs bearing serial number AA53286112A. Agents confirmed the money to be counterfeit because it lacked the security features found in genuine currency and appeared to have been manufactured on an inkjet style printing device using resumé-style paper. A search of CS revealed no additional counterfeit currency.

Conclusion

12. Based on the foregoing facts, your affiant respectfully submits that there is probable cause to believe that GEORGE COTTON, also known as "Shawn Cotton," JAMES WILLIAMS, also known as "Rico," and MICHAEL GRIFFIN sold, exchanged, transferred, and delivered false, forged, and counterfeited obligations of the United States, namely, counterfeit FRNs, with the intent that the same be passed, published, and used as true and genuine, in violation of 18 U.S.C. §§ 473 and 2.



Nicholas A. Shelton
Special Agent, U.S. Secret Service

SUBSCRIBED AND SWORN to before me on December 17, 2013.

Arlander Keys
ARLANDER KEYS
United States Magistrate Judge